

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON,  
SERGIO DeLEON, FLOYD J. CARRIER,  
ANNA BURNS, MICHAEL MONTEZ,  
PENNY POPE, OSCAR ORTIZ, KOBY  
OZIAS, JOHN MELLOR-CRUMMEY,  
PEGGY HERMAN, EVELYN  
BRICKNER, GORDON BENJAMIN,  
KEN GANDY, LEAGUE OF UNITED  
LATIN AMERICAN CITIZENS  
(LULAC) and DALLAS COUNTY,  
TEXAS

*Plaintiffs,*

v.

RICK PERRY, Governor of Texas; and JOHN  
STEEN, Texas Secretary of State,

*Defendants.*

UNITED STATES OF AMERICA,

*Plaintiffs,*

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, IMANI CLARK,  
AND MICHELLE BESSIAKE,

*Plaintiff-Intervenors,*

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, AND HIDALGO  
COUNTY,

*Plaintiff-Intervenors,*

v.

STATE OF TEXAS, JOHN STEEN, in his  
Official capacity as Texas Secretary of  
State and STEVE McCRAW, in his  
Official capacity as Director of the Texas  
Department of Public Safety,

*Defendants.*

Civil Action No.:  
Case No. 2:13-CV-00193 (NGR)  
[Lead Case]

Civil Action No.:  
2:13-CV-00263 (NGR)

TEXAS STATE CONFERENCE OF  
NAACP BRANCHES; and the MEXICAN  
AMERICAN LEGISLATIVE CAUCUS  
OF THE TEXAS HOUSE OF  
REPRESENTATIVES,

*Plaintiffs*

v.

JOHN STEEN, in his official capacity as  
Secretary of State of Texas, and STEVE  
McCRAW, in his official capacity as  
Director of the Texas Department of  
Public Safety

*Defendants.*

BELINDA ORTIZ, LENARD TAYLOR,  
EULALIO MENDEZ, JR., LIONEL  
ESTRADA, ESTELA GARCIA  
ESPINOSA, LYDIA LARA,  
MARGARITO MARTINEZ LARA,  
MAXIMINA MARTINEZ LARA, AND  
*LA UNION DEL PUEBLO ENTERO, INC.*

*Plaintiffs*

v.

STATE OF TEXAS, JOHN STEEN, in  
His official capacity as Texas Secretary of  
State, and STEVE McCRAW, in his  
Official capacity as Director of the Texas  
Department of Public Safety

*Defendants.*

Civil Action No.:  
2:13-CV-00291 (NGR)

Civil Action No.:  
2:13-CV-00348 (NGR)

### **VEASEY-LULAC PLAINTIFFS' DESIGNATION OF EXPERTS**

Plaintiffs, Marc Veasey, Jane Hamilton, Sergio DeLeon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crummey, Peggy Herman, Evelyn Brickner, Gordon Benjamin, Ken Gandy, League of United Latin American Citizens and Dallas County file this Designation of Expert Witnesses, and would show this Honorable Court as follows:

I.

Veasey-LULAC Plaintiffs' Designation of Retained Expert Witnesses

1. Matt A. Barreto, PhD.  
Department of Political Science  
University of Washington  
Box 353530  
Seattle, Washington  
909-489-2955

Gabriel Ramon Sanchez, PhD.  
Department of Political Science  
University of New Mexico  
Box MSC05 3070  
Albuquerque, New Mexico  
505-277-5104

Dr. Barreto and Dr. Sanchez's joint report and other Rule 26 disclosures are produced herewith. Dr. Barreto and Dr. Sanchez are designated as expert witnesses on behalf of the Veasey-LULAC Plaintiffs and the NAACP-MALC Plaintiffs.

2. George Korbel  
220 Gardenvue  
San Antonio, Texas 78213

Mr. Korbel's report and other Rule 26 disclosures are produced herewith.

3. T. Ransom Cornish, C.P.A., J.D.  
One Sugar Creek Center Boulevard, Suite 340  
Sugar Land, Texas 77478  
281-207-1954

Mr. Cornish's report and other Rule 26 disclosures are produced herewith.

4. Michael C. Herron  
Dartmouth College  
Department of Government  
201 Silsby Hall  
Hanover, NH 03755  
603-646-2693

Dr. Herron's report and other Rule 26 disclosures are produced herewith.

5. Randall Buck Wood  
Ray & Wood  
2700 Bee Caves Road  
Austin, Texas 78746  
512-328-8877

Mr. Wood's report and other Rule 26 disclosures are produced herewith.

6. Allan J. Lichtman  
Department of History  
American University  
9219 Villa Dr.  
Bethesda, MD 20817  
202-885-2411

Dr. Lichtman's report and other Rule 26 disclosures are produced herewith.

## II.

### Supplementation and Cross Designation

Plaintiffs hereby cross designates and states that they may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses.

Plaintiffs reserve the right to elicit by way of cross examination, opinion testimony from experts or corporate representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

Plaintiffs reserve the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas

regarding the facts of this case. Such witnesses include employees and/or officers of Dallas County, Texas and LULAC.

Plaintiffs reserve the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit. Plaintiffs reserve the right to call any expert witness of any party who may be added to this lawsuit.

Dated this 27th day of June, 2014.

Respectfully submitted,

**BRAZIL & DUNN**

/s/ Chad W. Dunn

---

Chad W. Dunn  
State Bar No. 24036507  
K. Scott Brazil  
State Bar No. 02934050  
Brazil & Dunn  
4201 Cypress Creek Parkway, Suite 530  
Houston, Texas 77068  
Telephone: (281) 580-6310  
Facsimile: (281) 580-6362  
[chad@brazilanddunn.com](mailto:chad@brazilanddunn.com)  
[scott@brazilanddunn.com](mailto:scott@brazilanddunn.com)

J. Gerald Hebert  
D.C. Bar No. 447676  
Campaign Legal Center  
215 E Street, NE  
Washington, DC 20002  
Telephone (202) 736-2200 ext. 12  
Facsimile (202) 736-2222  
[GHebert@campaignlegalcenter.org](mailto:GHebert@campaignlegalcenter.org)  
(Pro Hac Vice Motion Granted)

Neil G. Baron  
State Bar No. 01797080  
Law Office of Neil G. Baron  
914 FM 517 W, Suite 242  
Dickinson, Texas 77539  
Telephone (281) 534-2748  
Facsimile (281) 534-4309  
[neil@ngbaronlaw.com](mailto:neil@ngbaronlaw.com)

David Richards  
State Bar No. 16846000  
Richards, Rodriguez & Skeith, LLP  
816 Congress Avenue, Suite 1200  
Austin, Texas 78701  
Telephone (512) 476-0005  
Facsimile (512) 476-1513  
[daverichards4@juno.com](mailto:daverichards4@juno.com)

Armand G. Derfner  
Derfner, Altman & Wilborn, LLC  
P.O. Box 600  
Charleston, S.C. 29402  
Telephone (843) 723-9804  
[aderfner@dawlegal.com](mailto:aderfner@dawlegal.com)  
(Pro Hac Vice Motion Granted)

*Attorneys for Veasey-LULAC Plaintiffs*

LUIS ROBERTO VERA, JR.  
LULAC National General Counsel  
State Bar No. 20546740  
The Law Offices of Luis Vera Jr., and Associates  
1325 Riverview Towers, 111 Soledad  
San Antonio, Texas 78205-2260  
Telephone (210) 225-3300  
Facsimile (210) 225-2060  
[lrqlaw@sbcglobal.net](mailto:lrqlaw@sbcglobal.net)

*Attorney for LULAC*

Craig M. Watkins  
Dallas County District Attorney  
State Bar No. 00791886  
Teresa G. Snelson  
Chief, Civil Division  
Dallas County District Attorney's Office  
State Bar. No. 08577250  
411 Elm Street, 5<sup>th</sup> Floor  
Dallas, TX 75202-4606  
Telephone (214) 653-7358  
Facsimile (214) 653-6134  
[Teresa.Snelson@dallascounty.org](mailto:Teresa.Snelson@dallascounty.org)

*Attorneys for Dallas County, Texas*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2014, I electronically provided the foregoing document with opposing counsel via ECF:

/s/ Chad W. Dunn

Chad W. Dunn